



# Transportation Center

2451 Baseline Road  
Grand Island, New York 14072-1667  
Phone (716) 773-8890  
Fax (716) 773-8992

January 18, 2008

National Highway Traffic Safety Administration  
U.S. Department of Transportation  
Docket Management Facility M-30  
West Building, Ground Floor, Room W12-140  
1200 New Jersey Ave. S.E.  
Washington D.C. 20590

2008 JAN 22 A 10:38

Docket#NHTSA-2007-0014, RIN 2127 – AK09

Dear Sir or Madam:

Attached are my comments on the Notice of Proposal Rulemaking regarding school bus occupant protection. As Supervisor for Transportation for Grand Island Central School District for twenty- five years I agree with the proposed rulemaking.

One of the few sure things in school transportation is that society is always in a hurry. Because of lap-shoulder belts, the additional school buses on the road holding up traffic and the additional time (little as it may be) to properly load students, I believe will result in an increase in the frequency of motorists passing stopped school buses.

Another component of the “perfect safety storm” is that unlike the family car parked in the driveway, a school bus picks up and discharges students on the road. In northern climates, a typical elementary student wears a jacket, hood, hat, scarf and gloves. They carry book-packs that weigh as much as they do and carry in their hands other “normal” carry on items. Compartmentalization along with other students sitting or trying to sit in the same seat does not provide a lot of room. The military calls it task saturation. While the school bus driver looks and waits for the student to get properly seated, I believe that school bus drivers will miss seeing the ever occurring obvious child that is running late that day or the child that stops in front of the bus to pick up an item that they dropped.

The final ticking issue is the potential for serious neck injuries due to improper adjustment of the shoulder strap. Unlike the family car, a school bus does not have booster seats. Along with younger students not adjusting the shoulder strap properly so that it doesn't go across their neck, the reality of high backed seats is that students even while wearing lap-shoulder belts will lean into the aisle to talk to students sitting around them. If this occurs the shoulder belt will slide across their neck. If the school bus stops quickly or is involved in an accident, the sudden force placed on the neck can be catastrophic.

I know that this is a King Solomon decision and I thank you in advance for your wise approach.

Sincerely,

A handwritten signature in black ink that reads "Jack Burns". The signature is written in a cursive style with a long, sweeping underline.

Jack Burns  
Supervisor for Transportation  
Grand Island Central School District